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IN RE:

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GOOGLE ANTITRUST LITIGATION

5

60-516110-0009

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8   ORAL VIDEOTAPED DEPOSITION

9   GEORGE LEVITTE

10   AUGUST 10, 2021

11   "HIGHLY CONFIDENTIAL"

12

13   ORAL VIDEOTAPED DEPOSITION OF GEORGE LEVITTE,

14   produced as a witness at the instance of the United

15   States Department of Justice Antitrust Division and duly

16   sworn, was taken in the above-styled and numbered cause

17   on the 10th day of August, 2021, from 10:45 a.m. to

18   8:16 p.m., before Melinda Barre, Certified Shorthand

19   Reporter in and for the State of Texas, reported by

20   computerized stenotype machine, all parties appearing

21   remotely via web videoconference, pursuant to the rules

22   of procedure and the provisions stated on the record or

23   attached hereto.

24

25

1   Q.   And you prepared this document?

2   A.   I think so. I'm not sure if this was pulled

3   from the perf tool or if this was my own copy. But

4   there's a perf tool where we input our own performance

5   evaluation stuff, and I normally prepare my own in a

6   document before I put it into the tool. So this might

7   be the document that I prepared in advance of putting it

8   into Google's tool.

9   Q.   And this document was projects you worked on in

10   2020 and the beginning of 2021?

11   A.   Yeah. I see some of it says beginning of 2021.

12   So this must have been for spring of 2021.

13   Q.   The first project you were the PM lead and

14   manager for project leadership with sell-side

15   serving/option/indirect?

16   A.   Yes. I see that section.

17   ██

18   ██

19   ██

20   ██████████████████████████████████████

21   ████████████████

22   ██████████████

23   ████████████████████████████████████

24   served by DFP?

25   A.   It's an estimate. We don't have precise

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1   numbers, and there are a number of ways in which our

2   product analysts try to estimate that number. But

3   that's our internal best guess.

4   Q.   And does that figure include traditional

5   reservation sales?

6   A.   Yes.

7   ██

8   ads served how many were traditional reservation ads?

9   A.   Off the top of my head, I think it was roughly

10   60 percent direct and 40 percent indirect. Traditional

11   reservation, it depends on what you're talking about;

12   but that term could be used in reference to sponsorship

13   standard or in reference to a number of indirect demand

14   sources, price point, bulk network. So it depends on

15   how you're using that term. I have to caveat.

16   Q.   So if we're talking about, like, traditional IO

17   orders -- you understand that reference, insertion

18   orders?

19   A.   So we think of ads in Ad Manager in a number of

20   ways. One is programmatic versus nonprogrammatic.

21   That's one way to think of different parts of the

22   business. Another is reserved versus nonreserved.

23   So when you say "traditional IO," it maybe

24   depends on exactly how the buyer and the publisher have

25   chosen to implement that in Ad Manager in terms of where

1   that counts towards.

2   A very traditional setup might be a

3   nonprogrammatic reservation booked as a sponsorship or a

4   standard. But it's possible that a traditional IO could

5   be booked in a different way, and it really just depends

6   on the setup used.

7   ██

8   ██

9   ██████████████████████████████████████

10 ██

11 ██

12 ██

13 estimates because we don't have precise data for a

14 number of reasons. So it's not totally accurate. But

15 it's derived from some analysis that's a best guess that

16 our product analysts have put together.

17   Q.   Does that figure include display video and app

18 ads?

19   A.   I believe it does but with varying levels of

20 accuracy. As I noted, the data -- I think the accuracy

21 varies a little bit across some of those because of some

22 of the technical challenges our product analysts have in

23 getting certain types of documents.

24   Q.   Is that a global figure?

25   A.   I believe this is for Ad Manager globally, yes.